



**U.S. Department of Justice**

United States Attorney  
Eastern District of Missouri

*Organized Crime Drug Enforcement Task Force*

**JAMES C. DELWORTH**  
Assistant United States Attorney

Thomas Eagleton U.S. Courthouse  
111 S. 10<sup>th</sup> Street, Rm. 20.333  
St. Louis, MO 63102

OFFICE: 314-539-2200  
DIRECT: 314-539-6242  
FAX: 314-539-2312  
james.delworth@usdoj.gov

October 16, 2014

Mr. John D. Stobbs, II  
Attorney at Law  
307 Henry Street, Suite 211  
Alton, Illinois 62002

Mr. James E. Crowe, III  
Dowd Bennett LLP  
7733 Forsyth Boulevard, Suite 1900  
St. Louis, Missouri 63105

Mr. J. Christian Goeke  
Attorney at Law  
7711 Bonhomme Avenue, Suite 850  
Clayton, Missouri 63105

Mr. Christopher P. Threlkeld  
Lucco, Brown, Threlkeld, Dawson  
224 St. Louis Street  
P.O. Box 539  
Edwardsville, Illinois 62025

Re: United States v. United States v. Palmer, et. al., 4:14CR00175 AGF  
United States v. Lentsch, et. al., 4:14CR00150 JAR  
United States v. Berra, et. al., 4:14CR00187 JAR  
United States v. Palmer, et. al., 4:14CR00152 RWS

Dear Mr. Stobbs, Crowe, Goeke and Threlkeld:

This letter is in response to your letters regarding discovery in anticipation of the October 17, 2014 status conference. To date, the majority of investigative reports and all search warrants and seizure warrants issued by the date of arrest have been disclosed. This material corresponds to the events set forth in the Rule 12(b) notice and will allow for the preparation of pre-trial motions. This material was contained on the three discs referenced in your letters.

A fourth disc of discovery was near completion when the power was shut down in the federal courthouse resulting in the loss of over two weeks of inputted material. We are in the process of re-inputting the material and anticipate disclosure by next Friday, October 14, assuming no further disruptions. This disc will contain financial documents as well as electronically stored information from numerous cell phones and computers. A fifth disc containing the remaining electronically stored information, additional laboratory reports that have been received, investigative reports and other miscellaneous information will be disclosed as soon thereafter as possible. Discovery will be an ongoing process as

**EXHIBIT "B" to  
Defendants' Joint Motion to Amend the Order Concerning Pretrial Motions**

October 16, 2014

Page 2

electronic devices are downloaded, investigative reports generated and laboratory analysis completed.

Certain financial documents which may contain personal information have been disclosed only to the defendant account holder. However, this material may be reviewed upon appointment. Additionally, there is a considerable amount of physical evidence seized in this case referenced in the investigative reports which also may be viewed upon request.

We continue to extend the invitation to meet with defense counsel to answer any questions pertaining to discovery.

Very truly yours,

RICHARD G. CALLAHAN  
United States Attorney

JAMES C. DELWORTH  
Assistant United States Attorney

JCD

**EXHIBIT "B" to  
Defendants' Joint Motion to Amend the Order Concerning Pretrial Motions**